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DMD Chicken, LLC; and Defendants Frederick
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BC LICENSING, LLC, a Nevada limited liability
company,

Plaintiff,

vs.

DMD CHICKEN, LLC, a Florida limited liability
company; FREDERICK BURGESS, an
individual; and JACK FLECHNER, an
individual,

Defendants.

DMD CHICKEN, LLC, a Florida limited liability
company,

Counterclaim Plaintiff,

vs.

Case No. 2:25-cv-00453-JAD-NJK

**STIPULATION AND ORDER TO
EXTEND DMD CHICKEN, LLC'S
DEADLINE TO OPPOSE MOTIONS TO
DISMISS**

(FIRST REQUEST)

ECF No. 41

BC LICENSING, LLC, a Nevada limited liability company; BCIP, LLC, a Nevada limited liability company; JRS HOSPITALITY, LLC, a Nevada limited liability company; PERRY ROGERS, an individual; SHAQUILLE O'NEAL, an individual; COREY JENKINS, an individual; JOSHUA HALPERN, an individual; MATTHEW SILVERMAN, an individual; and SAMUEL STANOVICH, an individual,

Counterclaim Defendants.

**STIPULATION AND ORDER TO EXTEND DMD CHICKEN, LLC'S
DEADLINE TO OPPOSE MOTIONS TO DISMISS**

Defendant/Counterclaim Plaintiff DMD CHICKEN, LLC ("DMD") and Counterclaim Defendants BC LICENSING, LLC ("BC Licensing"); BCIP, LLC ("BCIP"); JRS HOSPITALITY, LLC ("JRS"); PERRY ROGERS ("Rogers"); SHAQUILLE O'NEAL ("O'Neal"); COREY JENKINS ("Jenkins"); JOSHUA HALPERN ("Halpern"); MATTHEW SILVERMAN ("Silverman"); and SAMUEL STANOVICH ("Stanovich") (collectively, the "Counterclaim Defendants"), by and through their respective counsel of record, hereby stipulate and agree as follows:

1. On April 30, 2025, BC Licensing, BCIP, Halpern, Silverman, and Stanovich filed their Motion to Dismiss DMD's Counterclaims [ECF No. 32] (the "BC Licensing Motion").

2. On April 30, 2025, O'Neal and JRS filed their Motion to Dismiss DMD's Counterclaims [ECF No. 34] (the "JRS Motion") (along with the BC Licensing Motion, the "Motions").

3. On May 2, 2025, Jenkins and Rogers filed their Joinder to the BC Licensing Motion [ECF No. 37].

4. On May 5, 2025, the Court set the Motions for hearing on June 3, 2025, at 1:30 p.m. [ECF No. 38].

5. Due to work-related scheduling conflicts for DMD's lead counsel who is primarily responsible for drafting oppositions to the Motions, including 7-9 depositions related to *Technical Arts Group LLC, et al. v. Abe V. Systems, Inc., et al.*, Case No. BER-C-00218-24, pending in the New Jersey Superior Court, Bergen County, Chancery Division (the "Depositions") and a speaking

1 engagement at the Hospitality Law Conference in Houston, Texas (the “Conference, wherein
 2 DMD’s lead counsel will be traveling the day before DMD’s Opposition deadline (May 13, 2025
 3 and speaking the day of DMD’s Opposition Deadline (May 14, 2025, as a matter of professional
 4 courtesy, and so that each side has full and fair opportunity to address the different arguments
 5 presented in the Motions, **the deadline for DMD to Oppose the Motions should be extended to**
 6 **May 30, 2025.**

7 6. Due to the aforementioned extension of time, the hearing on the Motions, originally
 8 noticed for June 3, 2025 [ECF No. 38], would need to be continued. The parties request that the
 9 Court reschedule the hearing to allow for sufficient time for this extension and the filing of replies.

10 7. This is the first extension of time for DMD to file an Opposition to the Motions.

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8. This stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 9th day of May, 2025.

DATED this 9th day of May, 2025.

BAILEY ♦ KENNEDY

GREENBERG TRAURIG, LLP

By: /s/ Joseph A. Liebman

By: /s/ Akke Levin

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Plaintiff DMD Chicken, LLC; and
Defendants Frederick Burgess and Jack
Flechner*

DATED this 9th day of May, 2025.

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By: /s/ Bradley G. Taylor

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Matthew Silverman; Samuel Stanovich; Corey
Jenkins; and Perry Rogers*

IT IS SO ORDERED. DMD has until May 30, 2025, to file its respective Oppositions to the Motions [ECF Nos. 32, 34, and 37]. The hearing on the motions is continued to July 7, 2025, at 1:30 p.m.


UNITED STATES DISTRICT JUDGE

DATED: May 12, 2025